

**JUDGE CASTEL**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - :

VIOLETTA HUNT, :

Defendant. :

----- x

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: <b>Nov 30 2007</b>
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INDICTMENT

07 Cr.

**07 CRIM 1082**

COUNT ONE

The Grand Jury charges:

From in or about March 2003, up to and including in or about December 2003, in the Southern District of New York and elsewhere, VIOLETTA HUNT, the defendant, unlawfully, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice and attempting so to do, did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, and did deposit and did cause to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, and did take and did receive therefrom, such matters and things, and did cause to be delivered by mail and such carriers, according to the direction thereon, and at the place at which it was to be delivered by the person to whom it was addressed, such matters

and things, to wit, HUNT, having devised a scheme to defraud the Lower Manhattan Development Corporation and the United States Department of Housing and Urban Development of grant money by making false representations that her mother resided at 310 Greenwich Street, New York, New York, on September 11, 2001, and that her mother intended to reside at that address for a period of two years commencing March 24, 2003, did mail, on or about May 8, 2003, via the United States Postal Service, a grant application to the Lower Manhattan Development Corporation containing false statements and fraudulent documents regarding her mother's residence.

(Title 18, United States Code, Sections 1341 and 2).

*Lin Butter Sturman*  
FOREPERSON LIN BUTTER STURMAN

*Michael J. Garcia*  
MICHAEL J. GARCIA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(18 U.S.C. §§ 1341 & 2)

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MICHAEL J. GARCIA

United States Attorney.

A TRUE BILL

*Law Butler* *Shuman*  
Foreperson.

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*11/30/07*  
*2nd Case assigned to Costel*  
*MD Gouther*